

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CYNTHIA RUSSO, LISA BULLARD,
RICARDO GONZALES, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS LOCAL 38 HEALTH AND
WELFARE FUND, INTERNATIONAL
UNION OF OPERATING ENGINEERS
LOCAL 295-295C WELFARE FUND, AND
STEAMFITTERS FUND LOCAL 439, on
Behalf of Themselves and All Others Similarly
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 17-cv-2246

Judge Edmond E. Chang
Magistrate Judge Sheila Finnegan

JOINT STATUS REPORT

Pursuant to the Court's June 26, 2023 Order (ECF No. 615), the parties, through their respective counsel, respectfully submit the following Joint Status Report.

I. The Current Deadlines Imposed by the Court and Whether the Matter Has Been Referred to the Magistrate Judge in Any Fashion

A. Deadline for the Close of Fact Discovery

With certain limited exceptions, and as described below in Section II, fact discovery closed on December 18, 2020, (ECF No. 320), and non-party fact discovery closed on June 1, 2021. (ECF No. 448).

B. Referral to Magistrate Judge Finnegan

On November 6, 2018, the Court referred this case to Magistrate Judge Finnegan for

general discovery supervision. (ECF No. 118.)

C. Expert Discovery and Class Certification

The Parties have concluded expert discovery and class certification briefing as set forth in the Agreed Order dated October 21, 2022, (ECF No. 545). The parties have submitted a proposed briefing schedule for the remaining oppositions and replies to their respective pending motions, as well as potential additional motions to be filed by the parties. (ECF No. 619.) This joint proposed briefing schedule remains pending before the Court.

II. The Progress of Discovery

The parties are meeting and conferring regarding certain discovery disputes, including a supplemental declaration they are negotiating regarding the PSC Database and the PSC Enrollment and Renewal Data. To the extent the parties are unable to resolve any disputes, motion practice may be required. The parties will promptly bring any issue before the Court if they reach an impasse.

III. Whether the Parties Have Engaged or Are Engaging in Settlement Discussions

The parties have not engaged in settlement discussions.

IV. Whether the Parties Believe a Telephonic Hearing or In-Person Hearing Is Necessary Within the Next 60 Days

The parties respectfully ask the Court to Order that the next Joint Status Report be submitted on or before October 26, 2023.

DATED: July 26, 2023

s/ Michael Scott Leib (with permission)

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

s/ Joseph P. Guglielmo

Joseph P. Guglielmo